



# University of Hawaii at Manoa

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Office of the Director

March 13, 1981

RP:0019

Pollution Technical Review Branch  
Department of Health  
State of Hawaii  
P.O. Box 3378  
Honolulu, Hawaii 96801

Dear Sir:

NPDES Permit No. HI 0020893  
Seacoast Test Facility  
Ke-Ahole Point, Hawaii

The following concerns relative to the land based test facility which will conduct biofouling and corrosion experiments in conjunction with the Ocean Thermal Energy Conversion Program have been brought to our attention. Perhaps these concerns have been addressed in the supporting material submitted with the NPDES permit application, if not we would suggest their consideration. This NPDES permit has been reviewed by Edward Laws, Oceanography; Reginald Young, WRRRC; Jacquelin Miller and Alexis Cheong Linder, Environmental Center.

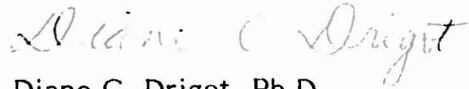
The proposed discharge of 0.72 mgd of extracted sea water used in the heat exchange process which is chlorinated to prevent biofouling (at a maximum application rate of 0.2 mg/l for 2 hours/daily as required by EPA) poses questions regarding environmental impacts. How far offshore will the discharge occur? Will the discharged water comply with objectives in the public health regulations Chapter 37-A, Sections 3.3 and 6.1? What is the temperature of the discharged water? Will it vary more than 1° from ambient conditions? What is the expected type and magnitude of the chlorine residual in the discharge?

We understand that there is little information available concerning the nearshore marine environment at Ke-Ahole Point. It is difficult to assess the environmental impacts of this project without baseline data. In order for proper assessment to occur we feel that monitoring of conditions at the proposed site is essential. Baseline data would be extremely useful in assessing future impacts of OTEC should the project be developed to full-scale usage.

March 13, 1981

Thank you for the opportunity to comment on this document. We look forward to receiving your forthcoming response.

Sincerely,



Diane C. Drigot, Ph.D.  
Acting Director

LU

cc: Ed Laws  
Reginald Young  
OEQC  
Jacquelin Miller  
Alexis Cheong Linder